

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

SAKARA LINDSEY,)	
)	
Plaintiff,)	
)	No. 1:24-cv-01984
v.)	
)	Hon. Thomas M. Durkin
SPEEDWAY LLC,)	
)	
Defendant.)	

JOINT MOTION TO STAY DEADLINES PENDING SETTLEMENT COMPLETION

Plaintiff Sakara Lindsey and Defendant Speedway LLC jointly move this Court to enter an order staying all deadlines and proceedings in this case, including those contained in the Court's October 11, 2024 minute order (Doc. 39). In support of this request, the parties state as follows:

1. Defendant's answer to the complaint is due November 8, 2024 (Doc. 39).
2. Plaintiff and Defendant have reached an agreement to settle this matter in its entirety and are in the process of executing a settlement agreement.
3. The parties respectfully request that the Court stay all deadlines and proceedings set out in the October 11, 2024 minute order, including the November 8, 2024 answer deadline, so that the parties can complete execution of the settlement agreement and file voluntary dismissal papers, which the parties anticipate can be completed by November 30, 2024.
4. The parties propose filing a status report by November 30, 2024 if settlement and dismissal are not completed by that date.
5. This request is made in good faith and not for purposes of delay.

WHEREFORE, Plaintiff and Defendant respectfully request that the Court stay all deadlines and proceedings in this case until November 30, 2024, to allow sufficient time for the parties to execute settlement paperwork and file voluntary dismissal papers.

Dated: November 6, 2024

Respectfully submitted,

SAKARA LINDSEY

SPEEDWAY LLC

By: /s/ David Michael Bizar

By: /s/ Matthew C. Wolfe

Samuel L. Eirinberg
DJC LAW, PLLC
140 South Dearborn Street, Suite 1610
Chicago, IL 60603
(872) 804-3400
sam@teamjustice.com

Matthew C. Wolfe
Ian M. Hansen
SHOOK, HARDY & BACON L.L.P.
111 South Wacker Drive, Suite 4700
Chicago, IL 60606
(312) 704-7700
mwolfe@shb.com
ihansen@shb.com

David Michael Bizar
DJC LAW, PLLC
1012 West Anderson Lane
Austin, TX 78757
(512) 220-1800
dbizar@teamjustice.com

Tristan L. Duncan (*pro hac vice*)
SHOOK, HARDY & BACON L.L.P.
2555 Grand Boulevard
Kansas City, MO 64108
(816) 474-6550
tlduncan@shb.com

Attorneys for Plaintiff Sakara Lindsey

Attorneys for Defendant Speedway LLC